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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

FEREYDUN TABAIAN and
AHMAD ASHRAFZADEH,

Plaintiffs,

v.

INTEL CORPORATION,

Defendant.

Civil Action No.: 3:18-cv-0326-HZ

**PLAINTIFFS' UNOPPOSED
MOTION FOR EXTENSION OF
TIME TO RESPOND TO INTEL'S
ANSWER, AFFIRMATIVE
DEFENSES AND COUNTERCLAIMS**

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CERTIFICATE OF COMPLIANCE

Pursuant to LR 7-1(a), counsel for Plaintiffs Fereydun Tabaian and Ahmad Ashrafzadeh certify that they conferred with counsel for Defendant Intel Corporation via e-mail on April 27, 2018, and Defendant does not oppose this motion.

MOTION

Pursuant to Federal Rule of Civil Procedure 6(b)(1), Plaintiffs Fereydun Tabaian and Ahmad Ashrafzadeh respectfully move to extend the time to respond to Intel Corporation's Answer, Affirmative Defenses and Counterclaims to Complaint for Patent Infringement until May 25, 2018. The current deadline is May 7, 2018.

ARGUMENT

Federal Rule of Civil Procedure 6 provides that a court may extend the time for a party to act for "good cause." Fed. R. Civ. P. 6(b)(1); *see also* LR 16-3. Plaintiffs Fereydun Tabaian and Ahmad Ashrafzadeh were served with the Answer and Counterclaims on April 16, 2018. The deadline for a response is May 7, 2018.

Plaintiffs Fereydun Tabaian and Ahmad Ashrafzadeh respectfully request a 2 1/2-week extension, through and including May 25, 2018, within which to respond to the Answer and Counterclaims, so that they may gather the information necessary to respond to the Answer and Counterclaims and discuss certain matters with Intel's counsel before filing any motion with this Court.

This motion is filed in good faith and not for any improper purpose or undue delay.

CONCLUSION

Plaintiffs Fereydun Tabaian and Ahmad Ashrafzadeh respectfully request that the Court extend their time to respond to Intel Corporation's Answer, Affirmative Defenses and Counterclaims to Complaint for Patent Infringement until May 25, 2018.

PLAINTIFFS' MOTION FOR EXTENSION TO RESPOND TO INTEL CORPORATION'S ANSWER, AFFIRMATIVE DEFENSES AND COUNTERCLAIMS

DATED this 1st day of May, 2018.

Respectfully Submitted,

By: /s/ Jeffrey S. Love

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CERTIFICATE OF CONFERENCE

I certify that defendant Intel does not oppose this motion.

/s/ Kathleen S. Rose

Kathleen S. Rose

CERTIFICATE OF SERVICE

I certify that this document is being served on all counsel of record through the Court's ECF system.

/s/ Kathleen S. Rose

Kathleen S. Rose